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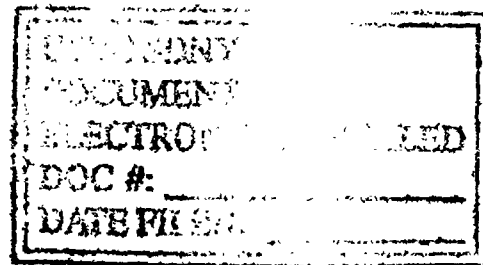
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

BERNARD B. KERIK,

Defendant.



INDICTMENT

07 Cr. 1027

COUNT ONE

(Conspiracy to Deprive the City of New York and
its Citizens of Honest Services)

The Grand Jury charges:

1. On or about January 5, 1998, BERNARD B. KERIK, the defendant, was appointed Commissioner of the New York City Department of Corrections ("NYCDOC"). As the Commissioner of the NYCDOC, KERIK oversaw and managed all City institutions established for the care and custody of felons, misdemeanants, prisoners under arrest and awaiting arraignment, violators of local laws and ordinances, and, in some instances, witnesses.

2. On or about August 20, 2000, BERNARD B. KERIK, the defendant, left his post as the Commissioner of the NYCDOC and became the Commissioner of the New York City Police Department ("NYCPD"), where he remained until he resigned on or about January 1, 2002. As New York City's chief law enforcement officer, KERIK had a duty to prevent crime, detect and arrest

COUNTS FIFTEEN AND SIXTEEN**(False Statements to the Federal Government)**

The Grand Jury further charges:

44. The allegations contained in paragraphs one through twenty and forty-one through forty-two of this Indictment are repeated and realleged as though fully set forth herein.

45. On or about the dates set forth below, in the District of Columbia and elsewhere, BERNARD B. KERIK, the defendant, in matters within the jurisdiction of the executive branch of the Government of the United States, unlawfully, willfully and knowingly did falsify, conceal and cover up by trick, scheme and device a material fact, and did make, materially false, fictitious and fraudulent statements and representations, including, among others, the following:

COUNT	APPROXIMATE DATE	DOCUMENT OR OFFICIAL	FALSE STATEMENT
15	12/5/2004	email to White House Official B	KERIK made various false and misleading statements about his relationship with John Doe #1, John Doe #2, and XYZ.
16	11/17/2004-12/3/2004	White House Official C	In response to questions that called for such information, KERIK failed to disclose: his relationship with John Doe #1, John Doe #2, and John Doe #3 and the benefits he received from John Doe #1, John Doe #2, and XYZ.

(Title 18, United States Code, Section 1001)